

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

WILLIAM LAWRENCE REED JR.

Case: 2:22-mj-30358

Assigned To : Unassigned

Assign. Date : 8/23/2022

CMP: USA v REED (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 31, 2022 through August 23, 2022 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. Section 922(g)(1)

Offense Description

Felon in Possession of a Firearm and Ammunition

This criminal complaint is based on these facts:

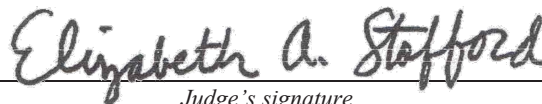
See attached affdiavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 23, 2022

City and state: Detroit, Michigan

*Complainant's signature*Kenton Weston, ATF Special Agent*Printed name and title**Judge's signature*Elizabeth A. Stafford, United States Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Kenton Weston, being duly sworn, hereby state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since January 2018. I am currently assigned to the Detroit Field Division, Group II Gun Violence Task Force (GVTF). I am tasked with investigating violations of federal firearms and illicit controlled substance laws. I have been involved in over a hundred investigations, which have resulted in the seizure of illicit controlled substances and hundreds of firearms. I have graduated from the Federal Law Enforcement Training Center and ATF Special Agent Basic Training.

2. I make this affidavit in support of a criminal complaint for William Lawrence REED Jr. (DOB: XX/XX/2000), a multi- convicted felon. Probable cause exists that REED violated 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm.

3. This affidavit is based on my own personal observations and knowledge as well as my review and analysis of oral and written reports, my discussions with other law enforcement officers, and my

training and experience. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all the information known to law enforcement related to this case.

II. REED'S CRIMINAL HISTORY AND PENDING CHARGES

4. REED's criminal history revealed that he has the following felony convictions and is prohibited from possessing firearms:

5. 2018 – REED pleaded no contest to felony Possession of a Controlled Substance Less than 25 Grams, Sixth Judicial Circuit, Oakland County, Michigan; and

6. 2020 – REED pleaded no contest to felony Unarmed Robbery, Sixth Judicial Circuit, Oakland County, Michigan.

7. On June 17, 2022, the Oakland County Sheriff's Office (OCSO) arrested REED for Possession With the Intent to Distribute a Controlled Substance. Since June 21, 2022, REED has been on state pre-trial bond. Conditions of his bond include a "no firearms" provision, a GPS tether, and home confinement at the Subject Premises. REED's pretrial supervising agent indicated that REED is only allowed to leave

the Subject Premises for drug testing, medical, and attorney appointments.

8. A search of the Law Enforcement Information Network revealed the Subject Premises has been REED's registered address since November 2, 2019.

III. PROBABLE CAUSE

9. On August 23, 2022, a federal search warrant was executed at 285 South Blvd West Pontiac, Michigan, Eastern District of Michigan. Prior to the execution of a search warrant at REED's residence, state and federal search warrants were obtained for REED's cellular phone. The search warrants revealed that REED has posted pictures online of himself in possession of firearms for the last two years; as recently as June of 2022.

10. I reviewed the Instagram profile associated with Instagram Vanity Name: "libertyst_boogs". I compared an image of REED to the individual depicted as the Instagram user in the profile photograph and other images posted on the "libertyst_boogs" account. I concluded REED was the individual depicted in the profile photograph, other posted images, and the individual who accessed and utilized this account.

11. REED's publicly available Instagram posts and "stories", included images of REED brandishing suspected firearms.

12. On December 25, 2020, REED posted himself with a suspected silver and black semi-automatic pistol with an extended magazine. The firearm was tucked into his waistband.

13. On August 6, 2021, REED posted himself with two suspected firearms.

14. On May 17, 2022, REED participated in a text conversation with the contact name "Zadia". During the text conversation, Zadia asked if REED knew anyone who would purchase a Glock 40 caliber 50 round drum magazine. REED replied, "Idk [I don't know] I got a 9". Based on my training and experience, in the context of this conversation, a "9" is reference to a 9mm caliber Glock pistol. I believe REED told "Zadia" that he had a 9mm Glock pistol.

15. On March 29, 2022, REED posted himself with another individual standing in front of a suspected Kel-Tec PLR 16 pistol, United States currency, and two large-knotted plastic bags of suspected marijuana.

16. An image time stamped as May 31, 2022, at 9:45 a.m., displayed a Glock 17 Gen 5 9mm handgun. The handgun's serial number was "BUGW880". There was also a NC Star light with laser affixed and a transparent red plastic extended magazine with nine rounds of visible ammunition inserted into the firearm. The Glock was on the lap of a person. (See Image 1 below).

17. A second picture was taken approximately four hours later. In the second picture, REED had a drum magazine protruding out of his shorts. (See Image 2 below).

18. Less than a month later, in an image dated June 16, 2022, REED wore a white t-shirt, a Charlotte Hornets tank top, a silver bullet chain, and what appears to be a Glock 17 Gen 5 9mm firearm, with a NC Star light with laser affixed, and a drum magazine inserted into the firearm. Other than the drum magazine, the firearm matched the firearm depicted in the May 31, 2022. (See Image 3 below).

19. Approximately a month and a half later, on August 2, 2022, a music video was posted on YouTube that depicted REED, at a residence location in Pontiac, with a Glock 17 Gen 5 with a NC Star light with laser affixed. Based on the make, model, and aftermarket

affixed NC Star light and laser, the Glock REED brandished in the video matched the firearm in the May 31, 2022, post depicted in Image 1.

20. In text messages from March 2022 through May of 2022, REED communicated with different individuals about firearms.

21. During the August 23, 2022, search warrant execution, the ATF seized a black Glock thirty-one round extended magazine. Inside the magazine were three rounds of Blazer 9mm ammunition and twenty-two rounds of CCI 9mm ammunition. The magazine was found on top of a Rubbermaid container in REED's bedroom. According to the homeowner, REED shared the bedroom with a juvenile who is approximately five years-old.

22. The ATF advised REED of his *Miranda* Rights. REED waived his rights and agreed to answer their questions. I showed REED several pictures from his social media accounts and his cellular phone (see Images 1, 2 , and 3 below).

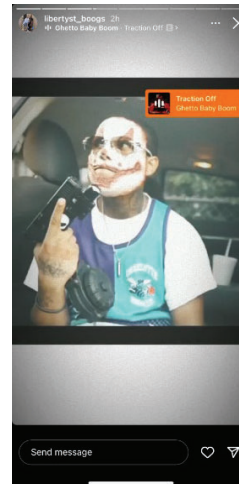
Image 1



Image 2



Image 3



23. After reviewing Images 1, 2, and 3, REED made the following statements:

- a. He denied he was depicted in Image 1 with the gun sitting in an individual's lap;
- b. He acknowledged that the firearm he possessed in Image 2 is the same firearm he possessed in Image 3;
- c. He admitted that the firearm in Images 2 and 3 was a real firearm;
- d. He found the firearm from Images 2 and 3 on a street in Pontiac after an unidentified person had been chased by the police. REED believed that the

unidentified person threw the firearm during the chase;

- e. He knew the firearm from Images 2 and 3 was loaded. When he found the firearm, he could tell it was already loaded with ammunition;
- f. He acquired the firearm between March and June of 2022; and
- g. He was aware of the fact that there was a magazine and ammunition in his room at the time ATF executed the search warrant.

24. I searched the Law Enforcement Information Network and learned that the Glock from Image 1 was purchased on March 18, 2022. I interviewed the original purchaser who acknowledged they purchased the black Glock. The last time the original purchaser saw the firearm was no later than May 15, 2022, and believes that the firearm was stolen by someone the original purchaser knew.

25. Meta data established that Image 1 was created on May 31, 2022.

26. I carefully reviewed Images 1 and 3. Based on my training and experience, they appear to be the same firearm.

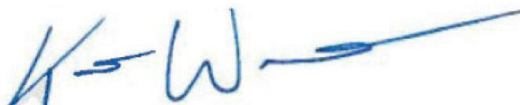
27. On August 23, 2022, I contacted Special Agent Jimmie Pharr, an ATF Interstate Nexus Expert, and gave him a verbal description of the firearm depicted in Images 1 and 3. Based upon the verbal descriptions, Special Agent Pharr advised that the firearm is a firearm as defined under 18 U.S.C. § 921 and was manufactured outside of the state of Michigan after 1898. Therefore, the weapon was shipped or transported in, and in or affected interstate commerce.

28. Special Agent Pharr was provided a verbal description of the recovered live ammunition. Based upon the verbal description, Special Agent Pharr advised the recovered 9mm caliber ammunition were readily available commercial ammunition and, due to the fact commercially manufactured 9mm ammunition has not been manufactured in the State of Michigan, therefore, the ammunition was shipped or transported in, and in or affected interstate commerce.

IV. CONCLUSION

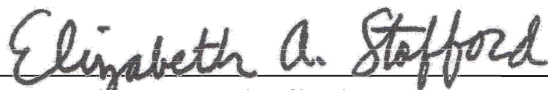
29. Probable cause exists that REED's illegal possession of firearms, as a felon, exists at the Subject Premises.

Respectfully Submitted,



Kenton Weston, ATF Special Agent

Sworn to before me and signed in my
Presence and/or by reliable electronic means



HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: August 23, 2022